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MEMO ENDORSED

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#: _____
DATE FILED: April 21, 2021

April 19, 2021

VIA ECF

The Honorable Judge Andrew L. Carter, Jr.
United States District Court Judge
Southern District of New York
40 Foley Square, Courtroom 435
New York, New York 10007

Re: Lauren Habetz v. Scotia Capital (USA) Inc.
Case No.: 1:21-cv-01861-ALC

Dear Honorable Judge Carter, Jr.:

The undersigned is counsel to Plaintiff Lauren Habetz (“Plaintiff”) in the above-referenced matter. I write jointly with Nicholas J. Pappas, counsel for Defendant, to respectfully propose a schedule for the Parties’ anticipated pleadings.

Plaintiff started this action by filing a Summons with Notice in the New York State Supreme Court, New York County on January 29, 2021. Defendant accepted service of the Summons with Notice on March 1, 2021 and thereafter removed this case to this Court. By agreement of counsel for the Parties, Plaintiff has not yet filed a complaint in this matter as the Parties are exploring a possible resolution of this matter through private mediation.

Accordingly, the Parties propose the following schedule for filing the anticipated pleadings and have attached as Exhibit A a Stipulation and Proposed Order setting forth the same:

Plaintiff’s deadline to file a complaint	July 20, 2021
Plaintiff’s deadline to respond to Defendant’s March 24, 2021 letter requesting that this matter and <i>Morrison v. Scotia Capital (USA) Inc.</i> , Case No. 1:21-cv-01859-SHS be designated related	August 3, 2021
Defendant’s deadline to Answer or otherwise respond to Plaintiff’s complaint	September 20, 2021

Habetz v. Scotia Capital (USA) Inc.

Page 2 of 2

April 19, 2021

Initial Conference

To be set by the Court
at your Honor's convenience

Respectfully submitted,
GODDARD LAW PLLC

/s/ Megan S. Goddard

By: Megan S. Goddard, Esq.

cc: All counsel [*Via ECF*]

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LAUREN HABETZ,

Plaintiff,

v.

SCOTIA CAPITAL (USA) INC.

Defendant.

Case No. 1:21-cv-01861-ALC

**STIPULATION AND
ORDER EXTENDING
PLAINTIFF'S TIME TO FILE
A COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel that:

1. Plaintiff's time to file her Complaint shall be extended to July 20, 2021.
2. The deadline for Defendant to answer, move or otherwise respond to the Complaint shall be September 20, 2021.
3. This Stipulation and Order may be modified by mutual agreement of the parties, subject to Court approval, or by motion for good cause shown.
4. Entry into this Stipulation shall not prejudice or adversely affect any other rights, claims, or defenses of any party, and all other rights, claims, and defenses (and responses thereto) are expressly preserved by the parties.

IT IS FURTHER STIPULATED AND AGREED, that this Stipulation may be executed in counterparts and such counterparts together shall constitute the entire Stipulation. Fax/email signatures shall be deemed originals.

Dated: New York, New York
April 19, 2021

GODDARD LAW PLLC

By: Megan Goddard
Megan S. Goddard

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Counsel for Plaintiff

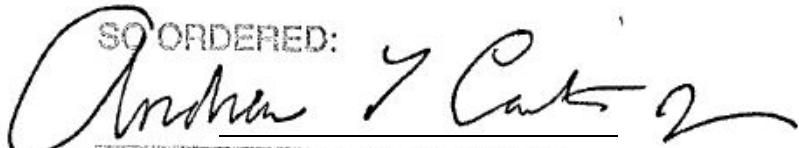
WEIL, GOTSHAL & MANGES LLP

By: /s/ Nicholas J. Pappas
Nicholas J. Pappas

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New York, New York 10153
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*Counsel for Defendant Scotia
Capital (USA) Inc.*

**Plaintiff's deadline to file its complaint is extended to July 20, 2021
and its deadline to respond to Defendant's March 24, 2021 letter is
extended to August 3, 2021. Defendant's deadline to file an answer or
otherwise respond to the complaint is extended to September 20, 2021.**

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

Dated: April 21, 2021